

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Inquiry Regarding Carrier Current Systems,)	ET Docket No. 03-104
including Broadband over Power Line Systems)	
)	

To: The Commission

**COMMENTS OF
NATIONAL PUBLIC RADIO, INC.**

National Public Radio, Inc. ("NPR") hereby submits its Comments regarding the Notice of Inquiry concerning Broadband over Power Line ("BPL") systems.¹

NPR is a non-profit membership corporation that produces and distributes noncommercial educational programming through more than 700 noncommercial educational ("NCE") stations nationwide. In addition to broadcasting award winning NPR programming, including *All Things Considered*[®], *Morning Edition*[®], *Talk Of The Nation*[®], and *Performance Today*[®], NPR's Member stations are significant producers of news, informational, and cultural programming. NPR also operates the Public Radio Satellite Interconnection System and provides representation and other services to its Member stations.

The Commission's objective of promoting the development of additional broadband means of electronic communication is self-evidently important, and NPR supports it. In pursuing this objective, however, the Commission must ensure that any use of BPL technology

¹ Inquiry Regarding Carrier Current Systems, including Broadband over Power Line

will not disrupt existing services. As the Notice recognizes, BPL technology may cause interference to existing services in different ways. Of particular concern to NPR, the additional RF energy introduced by BPL systems "may be carried through the electrical wiring to other devices also connected to the electrical wiring." These "other devices" would include many millions of clock, table, and other radios through which the American people receive important news, information, and cultural services each and every day.²

In addition, it is unclear which spectrum the Commission might authorize BPL systems to utilize. While the Commission has granted experimental BPL applications from 1.7 to 80 Mhz,³ the Notice inquires whether so-called "Access BPL devices [would] operate in other portions of the spectrum and at what bandwidth?"⁴ As the Commission is aware, FM radio occupies the spectrum from 87.9 to 107.9 MHz,⁵ and, depending on the spectrum employed, BPL systems may produce harmonic distortions and otherwise radiate energy in ways that could impair the reception of FM radio services.⁶ Indeed, according to a field study conducted by the American Radio Relay League, BPL "pose[s] a significant threat to amateur radio operations (and broadcasting) in the HF and low-VHF (TV channels 2-6) region."⁷ The FM spectrum

² Systems, Notice of Inquiry, ET Docket No. 03-104 (rel. Apr. 28, 2003) [hereinafter "Notice"].
Notice at ¶ 5.

³ Joint Comments of The Association For Maximum Service Television, Inc. and The National Association of Broadcasters, ET Docket No. 03-104, at 2 & n.4 (filed July 7, 2003).

⁴ Notice at ¶ 7.

⁵ 47 C.F.R. § 73.201.

⁶ See Comments of The Wireless Communications Association International, ET Docket No. 03-104, at 2 (filed July 7, 2003).

⁷ "ARRL Field Study Documents Interference from Broadband over Power Line, TV Technology, August 6, 2003, *reprinted at* <http://www.tvtechnology.com/dlrf/one.php?id=121>.

reserved for NCE use is immediately adjacent to the television channel 6 spectrum.

Therefore, in considering the use of BPL systems as an alternative platform for broadband deployment, we urge the Commission to closely examine BPL technology for its potential to cause interference to NCE services. We note that the Notice generally recognizes the need to "ensure the ongoing protection of the licensed radio services."⁸ Given the important public service NPR and its member NCE stations provide to the American people, we believe the Commission should exact specific assurances that any authorized BPL system will protect NCE services from interference.

Respectfully submitted,

NATIONAL PUBLIC RADIO, INC.

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August 19, 2003

⁸ Notice at ¶ 12.